



Air Program Standard

1. PURPOSE

This Standard establishes minimum requirements and expectations for ensuring compliance with applicable federal, state, and local air quality requirements as well as all air-related voluntary initiatives.

2. SCOPE

This Standard applies to company operated facilities that are subject to air regulations or voluntary programs. It applies to all personnel responsible for designing, permitting, constructing, testing, or operating equipment or facilities, as well as recordkeeping, and submittal of compliance reports. Where required to comply with regulations, contractors **shall** have their own Standard that meets or exceeds regulatory requirements.

3. DEFINITIONS

Air Compliance – Operating facilities in a manner that meets the requirements of the applicable air regulations and/or air permits. Any actions undertaken that go beyond the applicable regulations are considered voluntary.

Responsible Official (RO) – The corporate officer, as defined by regulation, or an authorized representative of the officer that approves and signs air permit applications and reports. This position is typically the Business Unit Vice President or Production Manager.

Shall – Denotes a minimum requirement to conform to the Standard. To aid the reader, “shall” requirements are identified in bold. Any deviation from a minimum requirement must be approved via the Standard Exception Form.

Should – Denotes a recommendation, or that which is advised, but not required to conform to the Standard.

4. ROLES & RESPONSIBILITIES

4.1 HEALTH, SAFETY, ENVIRONMENTAL AND REGULATORY (HSER)

- Maintain the Standard.
- Train on the Standard.
- Audit compliance with the Standard.
- Oversee air permitting process.
- Interpret, communicate, and implement air requirements.
- Submit all air-related agency reports or notifications associated with the facilities to agencies.

- Manage execution of air-related voluntary programs.
- Assist with advocacy efforts related to existing and proposed air regulations.
- Assess and communicate relevant risks associated with air compliance for Enterprise Risk Matrix and other business purposes.

4.2 OPERATIONS

- Conduct drilling, completion, and flowback activities in compliance with applicable air-related laws, regulations, voluntary programs, and requirements in company Standards.
- Maintain equipment data and operational data or records required by permits, regulations, and voluntary programs.
- Design, construct, operate and maintain facilities and/or projects in a manner that is in compliance with applicable air-related laws, regulations, voluntary programs, and related company Standards.
- Provide necessary data and/or documentation for the development of air permit applications.
- Work with HSER to execute air-related voluntary programs.
- Work with HSER to determine budgets and provide financial guidance for air-related projects.
- Designate the Responsible Official.

4.3 INFORMATION TECHNOLOGY (IT)

- Maintain and support systems used in air-related processes and procedures.
- Facilitate the design and implementation of data collection and IT systems.
- Systematize data across the enterprise so that EXE can meet agency monitoring, recordkeeping, and reporting requirements as well as voluntary program commitments.

4.4 EXTERNAL AFFAIRS AND SUSTAINABILITY

- Initiate and coordinate air-related voluntary partnerships.
- Monitor regulatory requirement changes and alert on those that can have a potential effect on operations.
- Lead advocacy efforts related to existing and proposed air regulations.
- Assess and communicate relevant risks associated with air compliance for Enterprise Risk Matrix and other business purposes.

4.5 LEADERSHIP

- Ensure this document is understood and complied with at all levels across area of responsibility.

4.6 ALL EMPLOYEES

- Comply with this Standard.

5. REQUIREMENTS

The Air Permitting Procedures and Air Permitting Source Determination Guidance **shall** be followed.

The following documents contain air-related processes that should be consulted.

- PSSR Standard
- Preventive Maintenance Standard
- Flare and Combustor Standard
- Incident and Near Miss Management Standard
- Management of Change Standard
- Flowback Standard
- General Automation Technical Bulletin
- Liquids Unloading Technical Bulletin
- Fugitive Monitoring Plan

6. TRAINING

Operations and HSER **shall** receive annual air awareness training.

7. AUDIT REQUIREMENTS

Audits **shall** be periodically conducted by HSER to confirm compliance with this Standard.

8. STANDARD EXEPTIONS

Any exceptions pertaining to Operational/HSER Standards **shall** be documented and approved using the Operations Standard Exception Form. Approval **shall** be obtained prior to commencing of any work that would otherwise fail to comply with the Standard. The Production Manager and HSER should be notified when submitting the exception.

9. DOCUMENT STORAGE AND RETENTION

Air permits and compliance records and other associated documents developed in accordance with this Standard or the associated Procedures **shall** be stored in the designated location, such as Document Center, file explorer, or SharePoint site. Final files (including air permits, calculation workbooks, etc.) **shall** be saved in the company's official file repository (Document Center) under the property number.

Documents **shall** be retained for the period required by the permit, regulation, applicable laws or the company Records Retention Policy, whichever is later.

10. REFERENCES

- Operations Standard Exception Process (OGB-EXE-QRC-001)
- Air Permitting Procedure (HSER-ENV-CHK-PRC-010)
- Air Permitting Procedure – Louisiana (HSER-ENV-CHK-PRC-013)
- Air Permitting Procedure – Pennsylvania (HSER-ENV-CHK-PRC-015)
- Air Permitting Source Determination Guidance (HSER-ENV-CHK-PRC-011)
- Incident Reporting and Management Standard (HSER-SAF-EXE-STD-005)
- Flare and Combustor Standard (INFR-FAC-CHK-STD-014)
- PSSR Standard (FAC-EXE-STD-011)
- Preventive Maintenance Standard (INFR-FAC-CHK-STD-012)
- Management of Change Standard (FAC-EXE-STD-018)
- Flowback Standard (OGB-EXE-STD-006)
- General Automation Technical Bulletin (INFR-FAC-CHK-BUL-063)
- Liquids Unloading Technical Bulletin (PROD-CHK-BUL-003)
- Fugitive Monitoring Plan (HSER-ENV-EXE-PLN-044)

11. DOCUMENT CONTROL TABLE

Title: AIR PROGRAM STANDARD Program Standard		Document Number: HSER-ENV-EXE-STD-0		
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Version	Issue Date	Description	Author(s)	Approved By
1.0	10/01/2025	Reviewed by Infrastructure Services, IT, HSER, External Affairs & Sustainability, Operations Managers, and Production Managers. Presented to OGB for approval.	Deirdre Shepherd, Clay Murrall	OGB